Message

From: Schmittdiel, Paula [Schmittdiel.Paula@epa.gov]
Sent: 5/15/2013 9:53:14 PM
To: Schmittdiel, Paula [Schmittdiel.Paula@epa.gov]
Subject: FW: 40th Street Outfall/Storm Sewer System email 11/5/12

From: Paula Schmittdiel/R8/USEPA/US
To: lisa.farrell@ci.denver.co.us
Cc: sisk.richard@epa.gov
Date: 11/05/2012 01:57 PM
Subject: 40th Street Outfall/Storm Sewer System

Lisa -

I have reviewed the "Summary of Historical Investigations Subsurface Investigations Associated with the High Street Outfall and 40th Ave. Storm Sewer System" (Summary) along with the maps that you sent via email on October 3, 2012. I offer the following comments.

The Summary submitted to the U.S. Environmental Protection Agency (EPA) consisted of 4 pages outlining the City's proposed plans for storm sewer improvements in and near Operable Unit 2 (OU 2) of the VB/I-70 Superfund Site. In addition to the summary, 7 maps/drawings were submitted along with the 60% complete engineering drawings. The Summary highlighted historical information of the surrounding area and the general findings of a Phase II Environmental Site Assessment (ESA) and the findings of a geotechnical investigation. Both of these reports were referenced in the summary, but were not submitted to EPA.

Historical information indicates that the area including and adjacent to the storm sewer alignment has had a landfill, a smelter site, as well as rail yards, all of which operated in the past. Some potential contaminants from these operations include heavy metals, such as lead and arsenic, asbestos, methane gas, lubricating and motor oils, diesel fuel, poly-aromatic hydrocarbons (PAHs) and creosote.

The limited sampling data provided in the summary and on the maps indicated that arsenic, asbestos and PAHs above Colorado Soil Evaluation Values (CSEVs) were detected soils. The PAHs exceeded the Worker CSEVs as well as the values for residential use. Volatile organic compounds including PCE and TCE were detected in groundwater at concentrations above the Colorado Department of Public Health and the Environment's (CDPHE) Basic Standards for groundwater. In addition, cadmium was also detected above CDPHE's Basic Standards. Methane gas was detected in the soil borings near the landfill at levels that exceeded the lower explosive limit.

Although the historical investigations identify a number of contaminants of concern in the area of the storm sewer improvements, some of which are above CDPHE risk based levels for workers or residents, the EPA does not consider the City's work on the storm sewer system to be a Superfund response action. Therefore the City should follow all applicable state or federal regulations and permit requirements. I would recommend additional characterization of the soil materials prior to and during construction activities to ensure that the health and safety plans and material handling/waste disposal plans adequately address the potential hazards and meet all regulatory requirements. I also recommend that groundwater that is encountered during construction should be containerized, until it has been adequately characterized to determine the appropriate disposal requirements.

The City did not submit project-specific plans for health and safety or material handling with the Summary. EPA understands that, once a contractor has been designated by the City, those plans would be prepared and submitted for our review. I would request that the City provide a copy of the Phase II ESA report and of the geotechnical investigation, as these reports could provide valuable information that would increase our understanding of contamination in OU 2 at VB/I-70.

If you have any further questions or concerns regarding the City's proposed plan, please feel free to give me a call.

Paula Schmittdiel

Remedial Project Manager
U.S. Environmental Protection Agency
1595 Wynkoop St.
Denver, Co 80202
303-312-6861 (office)
303-312-7151 (fax)
720-951-0795 (cell)